

Brian A. Bender, Esq. (BAB-0218)  
Harris Beach PLLC  
100 Wall Street  
New York, New York 10005  
(212) 687-0100

*Attorneys for Defendant*  
**HUDSON TOWERS HOUSING CO., INC.**

21 MC 102 (AKH)

IN RE: WORLD TRADE CENTER LOWER  
MANHATTAN DISASTER SITE LITIGATION

---

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

SIXTA T. GARCIA,

Plaintiff,

Case No.:  
07-CV-5292 (AKH)

-against-

ALAN KASMAN DBA KASCO, ANN TAYLOR STORES CORPORATION, B.C.R.E., BATTERY PARK CITY AUTHORITY, BFP ONE LIBERTY PLAZA CO., LLC, BLACKMON-MOORING-STEAMATIC CATASTOPHE, INC. D/B/A BMS CAT, BROOKFIELD FINANCIAL PROPERTIES, INC., BROOKFIELD FINANCIAL PROPERTIES, LP, BROOKFIELD PARTNERS, LP, BROOKFIELD PROPERTIES CORPORATION, BROOKFIELD PROPERTIES HOLDINGS INC., EMPIRE STATE PROPERTIES, INC., ENVIROTECH CLEAN AIR, INC., GENERAL RE SERVICES CORP., GPS ENVIRONMENTAL CONSULTANTS, INC., HILLMAN ENVIRONMENTAL GROUP, LLC., HUDSON TOWERS HOUSING CO., INC., INDOOR ENVIRONMENTAL TECHNOLOGY, INC., KASCO RESTORATION SERVICES CO., LEFRAK ORGANIZATION, INC., MERRILL LYNCH & CO, INC., NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC., NEW LIBERTY PLAZA LP, NEW YORK CITY ECONOMIC DEVELOPMENT CORPORATION, NEW YORK CITY INDUSTRIAL DEVELOPMENT AGENCY, NEW YORK CITY

---

**NOTICE OF ADOPTION OF  
ANSWER TO MASTER  
COMPLAINT OF HUDSON  
TOWERS HOUSING CO., INC.**

---

INDUSTRIAL DEVELOPMENT CORPORATION, NEW YORK TELEPHONE COMPANY, NOMURA HOLDING AMERICA, INC., NOMURA SECURITIES INTERNATIONAL, INC., ONE LIBERTY PLAZA, RELATED BPC ASSOCIATES, INC., RELATED MANAGEMENT CO., LP, STRUCTURE TONE (UK), INC., STRUCTURE TONE GLOBAL SERVICES, INC., THE BOARD OF MANAGERS OF THE ONE LIBERTY PLAZA CONDOMINIUM (CONDO #1178), THE ONE LIBERTY PLAZA CONDOMINIUM (CONDO #1178), THE RELATED COMPANIES, LP, THE RELATED REALTY GROUP, INC., TOSCORP INC., WESTON SOLUTIONS, INC., WFP ONE LIBERTY PLAZA CO., L.P., WFP ONE LIBERTY PLAZA, CO. GP, CORP., WFP ONE LIBERTY PLAZA, CO. GP, CORP., WFP TOWER B CO. G.P. CORP., WFP TOWER B HOLDING CO., LP, WFP TOWER B. CO., L.P., and WORLD FINANCIAL PROPERTIES, L.P.,

Defendants.

---

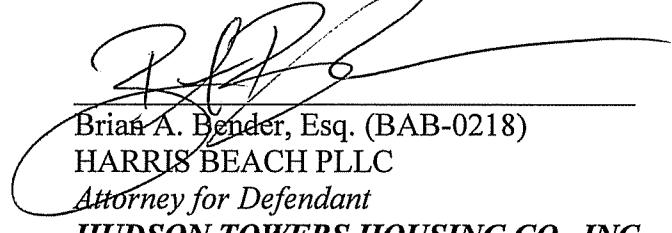
**PLEASE TAKE NOTICE THAT** defendant, HUDSON TOWERS HOUSING CO., INC., as and for its response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint filed in the above-referenced action, hereby adopts its Verified Master Answer dated July 30, 2007, which was filed in the matter of *In Re: World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH). HUDSON TOWERS HOUSING CO., INC. has filed a Master Disclosure of Interested Parties in 21 MC 102 (AKH), and as such, is exempt from having to file such a disclosure in this specific matter, pursuant to the provisions of Case Management Order No. 4 (¶ J(2)).

**WHEREFORE**, HUDSON TOWERS HOUSING CO., INC. demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York  
September 10, 2007

Yours etc.,

**HARRIS BEACH PLLC**

  
\_\_\_\_\_  
Brian A. Bender, Esq. (BAB-0218)

HARRIS BEACH PLLC

*Attorney for Defendant*

**HUDSON TOWERS HOUSING CO., INC.**

100 Wall Street, 23rd Floor

New York, New York 10005

(212) 687-0100

245293.1

21 MC 102 (AKH)

IN RE: WORLD TRADE CENTER LOWER  
MANHATTAN DISASTER SITE LITIGATION

---

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

SIXTA T. GARCIA,

Case No.:  
07-CV-5292 (AKH)

Plaintiff,

-against-

ALAN KASMAN DBA KASCO, ET AL.,

Defendants.

---

**NOTICE OF ADOPTION OF ANSWER TO MASTER COMPLAINT OF  
HUDSON TOWERS HOUSING CO., INC.**

**HARRIS BEACH, PLLC**  
*Attorneys for Defendant*  
**HUDSON TOWERS HOUSING CO., INC.**  
100 Wall Street, 23rd Floor  
New York, New York 10005  
(212) 687-0100